

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HARRIS CORPORATION,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO. 2:18-cv-00439-JRG
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
HUAWEI DEVICE USA, INC., HUAWEI	)	
DEVICE CO., LTD., HUAWEI	)	
TECHNOLOGIES USA INC., HUAWEI	)	
TECHNOLOGIES CO. LTD., AND	)	
HUAWEI DEVICE (SHENZHEN) CO.,	)	
LTD.	)	
	)	
Defendants.	)	

**HARRIS CORPORATION’S SECOND AMENDED DISCLOSURE OF ASSERTED  
CLAIMS AND INFRINGEMENT CONTENTIONS UNDER P.R. 3-1 AND DOCUMENT  
PRODUCTION ACCOMPANYING DISCLOSURE UNDER P.R. 3-2**

Pursuant to Patent Rules 3-1 and 3-2 of the United States District Court for the Eastern District of Texas, Harris Corporation (“Harris”) provides the following Disclosure of Asserted Claims and Infringement Contentions and Document Production Accompanying Disclosure relating to U.S. Patent Nos. 6,535,227; 6,958,986; 6,980,537; 7,027,426; 7,224,678; 7,327,690; and 7,440,572 (the “Asserted Patents”). Harris’ investigation of the infringing acts of Defendants Huawei Device USA, Inc., Huawei Device Co., Ltd., Huawei Technologies USA Inc., Huawei Technologies Co. Ltd., and Huawei Device (Shenzhen) Co., Ltd., collectively (“Huawei” or “Huawei Corporation”) is ongoing, and discovery has not started yet. Harris Corporation therefore expressly reserves the right to supplement or amend its contentions and disclosures herein based on additional information obtained through formal discovery or other

means concerning Huawei's Accused Instrumentalities or the Asserted Patents, or as appropriate in response to the Court's legal determination of issues, including, without limitation, the construction of the asserted claims.

## **I. ASSERTED CLAIMS (P.R. 3-1(a))**

Harris Corporation currently asserts that Huawei infringes the claims shown in the table below. All asserted claims identified in this section are collectively the "Asserted Claims."

<b>Patent No.</b>	<b>Asserted Claims</b>
6,535,227	1-6, 8-13, 15-20, 22, 24
6,958,986	1, 5-6, 9, 17, 21-22, 25
6,980,537	1-5, 10-11, 16-19, 24-25, 30-31, 33-34, 36-40, 45-49, 54-68
7,027,426	1-27
7,224,678	12-13, 17-20, 51-52, 56-58
7,327,690	32-34, 36, 38-43, 71-73, 75-80
7,440,572	1, 47

## **II. ACCUSED INSTRUMENTALITIES ((P.R. 3-1(b))**

Harris Corporation is currently aware of the following Huawei products that Huawei makes, uses, sells, offers to sell and/or imports that infringe the Asserted Claims of the Asserted Patents. All accused products identified in this section are collectively the "Accused Instrumentalities" or "Accused Products." Accused products identified for each patent are collectively referred to as the "Huawei '[xxx]' Patent Accused Products." Harris reserves the right to amend this list and add additional Huawei products upon further investigation or discovery.

<b>Patent No.</b>	<b>Claims</b>	<b>Accused Products</b>
6,535,227	1-6, 8-13, 15-20, 22, 24	Huawei eSight Products; Huawei FabricInsight Products; Huawei Software Defined

Patent No.	Claims	Accused Products
		Networking Management systems, including Agile Controller and Cybersecurity Intelligence System.
6,958,986	1, 5-6, 9, 17, 21-22, 25	<p>The Huawei Wi-Fi Products, as listed below with respect to the '426 patent.</p> <p>The Huawei Zigbee Products, as listed below with respect to the '537 patent.</p>
6,980,537	1-5, 10-11, 16-19, 24-25, 30-31, 33-34, 36-40, 45-49, 54-68	<p>Huawei products that support connectivity according to the Zigbee and/or IEEE 802.15.4 standards, (collectively the "Huawei Zigbee Products") including:</p> <ul style="list-style-type: none"> <li>• HS2145V,</li> <li>• LS2035V,</li> <li>• LS2025, and</li> <li>• Configuration Tools for the QIVICON Home Base product</li> <li>• Huawei Echolife ONT products that support Zigbee connectivity, including but not limited to those listed above as Zigbee Certified Products</li> <li>• Huawei AR160-M series routers that support Zigbee connectivity, including: <ul style="list-style-type: none"> <li>• AR169RW-P-M9</li> </ul> </li> <li>• Huawei AR502 series IoT gateways, including: <ul style="list-style-type: none"> <li>• AR502EG-L,</li> <li>• AR502EGW-L,</li> <li>• AR502EGRz-L,</li> <li>• AR502CG-L, and</li> <li>• AR502EG-L-PD</li> </ul> </li> <li>• X-Gen Wi-Fi AP7060DN access point</li> <li>• IoT Connection Management</li> </ul>

Patent No.	Claims	Accused Products
		Platform and associated IoT gateway devices that support Zigbee connectivity
7,027,426	1-27	<p>Huawei products that support connectivity according to the IEEE 802.11 Wi-Fi standards, including 802.11a/b/g/n, 802.11ac, and 802.11s, as well as Huawei's Mesh networking products (collectively the "Huawei Wi-Fi Products"), including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Huawei Access Points (e.g., AP1000, AP2000, AP4000, AP5000, AP6000, AP7000, AP8000, AP9000, AD9000 series of indoor and outdoor access points), including: <ul style="list-style-type: none"> <li>• AP2010DN</li> <li>• AP2030DN,</li> <li>• AP2050DN,</li> <li>• AP2050DN-E,</li> <li>• AP4030DN,</li> <li>• AP4130DN,</li> <li>• AP4030TN,</li> <li>• AP4050DN,</li> <li>• AP4050DN-E,</li> <li>• AP4050DN-HD,</li> <li>• AP4051DN,</li> <li>• AP4151DN,</li> <li>• AP4051TN,</li> <li>• AP5030DN,</li> <li>• AP5130DN,</li> <li>• AP6050DN,</li> <li>• AP6150DN,</li> <li>• AP6052DN,</li> <li>• AP7030DE,</li> <li>• AP7050DE,</li> <li>• AP7052DE,</li> <li>• AP7052DN,</li> <li>• AP7152DN,</li> <li>• AP7060DN,</li> </ul> </li> </ul>

Patent No.	Claims	Accused Products
		<ul style="list-style-type: none"> <li>• AP8030DN,</li> <li>• AP8130DN,</li> <li>• AP8130DN-W,</li> <li>• AP8050DN,</li> <li>• AP8150DN,</li> <li>• AP8050TN-HD,</li> <li>• AP8082DN,</li> <li>• AP8182DN,</li> <li>• AP9130DN,</li> <li>• AP9131DN,</li> <li>• AP9132DN,</li> <li>• AD9430DN-24,</li> <li>• AD9430DN-12,</li> <li>• R230D,</li> <li>• R240D,</li> <li>• R250D,</li> <li>• R250D-E,</li> <li>• R251D,</li> <li>• R251D-E, and</li> <li>• R450D</li> <li>• Huawei Access Controllers (e.g., AC6000 series access controllers), including: <ul style="list-style-type: none"> <li>• AC6003,</li> <li>• AC6005,</li> <li>• AC6605,</li> <li>• AC6800V,</li> <li>• ACU2 Wireless Access Controller Unit, and</li> <li>• X1E Access Controller Cards</li> </ul> </li> <li>• Huawei Routers (e.g., AR160-M series routers), including: <ul style="list-style-type: none"> <li>• AR161W-PM9, and</li> <li>• AR169RW-P-M9</li> </ul> </li> <li>• Huawei AR502 series IoT gateways, including: <ul style="list-style-type: none"> <li>• AR502EGW-L</li> </ul> </li> <li>• Huawei Access Network products, including: <ul style="list-style-type: none"> <li>• DN8245W-10,</li> <li>• DG8245V-10,</li> </ul> </li> </ul>

Patent No.	Claims	Accused Products
		<ul style="list-style-type: none"> <li>• DG8245W2-10,</li> <li>• DU8245W-10,</li> <li>• HG659-12, and</li> <li>• Huawei Echolife ONT products that support 802.11n/ac connectivity, including but not limited to:               <ul style="list-style-type: none"> <li>• HN8055Q,</li> <li>• HN8245Q,</li> <li>• HN8255Ws,</li> <li>• HG8045H,</li> <li>• HG8245H,</li> <li>• HG8245H(5dBi),</li> <li>• HG8245Q,</li> <li>• HG8245Q2</li> <li>• HG8245U,</li> <li>• HG8247H,</li> <li>• EG8141A5,</li> <li>• EG8045H,</li> <li>• EG8145V5,</li> <li>• EG8245H,</li> <li>• EG8245Q,</li> <li>• EG8245Q2,</li> <li>• EG8245H5,</li> <li>• EG8247W,</li> <li>• EG8247H,</li> <li>• EG8247Q,</li> <li>• EG8247H5, and</li> <li>• LS2035V</li> </ul> </li> <li>• Huawei LTE CPEs, including:               <ul style="list-style-type: none"> <li>• eA280-135,</li> <li>• eA280-204,</li> <li>• eA380-123,</li> <li>• eA380-135,</li> <li>• eA680-208, and</li> <li>• eA680-950 DAU</li> </ul> </li> <li>• Huawei Home Wi-Fi products, including:               <ul style="list-style-type: none"> <li>• Q2, and</li> <li>• A1</li> </ul> </li> </ul>

Patent No.	Claims	Accused Products
		The Huawei Zigbee Products, as listed above with respect to the '537 patent.
7,224,678	12, 13, 17, 18, 19, 20, <del>21</del> , 51, 52, 56, 57, 58	<p>Huawei <u>wireless local and metro area</u> networks (<u>Wireless LAN/MANs</u>) and products that support Wireless Intrusion Detection System (WIDS) and/or other similar intrusion detection technology, including:</p> <ul style="list-style-type: none"> <li>• Wireless LANs/MANs</li> <li>• Wireless LAN/MAN products</li> <li>• Huawei Laptops, tablets and consumer devices that support Wi-Fi (802.11), <u>and/or interact with or implement aspects of WIDS or similar intrusion detection technology (such as the Wi-Fi threat detection features of EMUI)</u>, when connected to a Huawei Wireless LAN/MAN, including: <ul style="list-style-type: none"> <li>• MateBook 13</li> <li>• MateBook X Pro</li> <li>• MateBook D 14" (AMD)</li> <li>• MediaPad M5 lite</li> <li>• MediaPad T5</li> <li>• MediaPad M5 8.4"</li> <li>• MediaPad M5 10.8"</li> <li>• MateBook X</li> <li>• MateBook D</li> <li>• MateBook D 14" (Intel)</li> <li>• MediaPad M5 Pro</li> <li>• MediaPad M3</li> <li>• MediaPad M3 Lite</li> <li>• MediaPad T3 10</li> <li>• MediaPad T3 8</li> <li>• MediaPad T3 7</li> <li>• MateBook E</li> <li>• MediaPad M2 10.0</li> </ul> </li> </ul>

Patent No.	Claims	Accused Products
		<ul style="list-style-type: none"> <li>• MediaPad T1 7.0</li> <li>• MediaPad T1 10.0</li> <li>• MediaPad M3 lite 10.0</li> <li>• Mate SE</li> <li>• <u>Porsche Design Huawei Mate 10</u></li> <li>• <u>Porsche Design Huawei Mate RS</u></li> <li>• <u>Porsche Design Huawei Mate 20 RS</u></li> <li>• Huawei Matebook X Pro</li> <li>• Mate 10 Pro</li> <li>• Mate 9</li> <li>• Ascend XT<sup>2</sup></li> <li>• <u>Elate</u></li> <li>• <u>Mate 20</u></li> <li>• <u>Mate 20 Lite</u></li> <li>• <u>Mate 20 Pro</u></li> <li>• <u>Mate 20 X</u></li> <li>• <u>P20</u></li> <li>• <u>P20 Lite</u></li> <li>• <u>P20 Pro</u></li> <li>• <u>P30</u></li> <li>• <u>P30 Lite</u></li> <li>• <u>P30 Pro</u></li> <li>• <u>Honor 7X</u></li> <li>• <u>Honor 8</u></li> <li>• <u>Honor 8A</u></li> <li>• <u>Honor 8X</u></li> <li>• <u>Honor 10</u></li> <li>• <u>Honor 10 lite</u></li> <li>• <u>Y7</u></li> <li>• <u>Y9</u></li> <li>• <u>nova 3</u></li> <li>• <u>nova 4</u></li> <li>• <u>P Smart</u></li> <li>• Huawei Access Points (APs) including: <ul style="list-style-type: none"> <li>• AD9000 series (such as AD9431DN-24X Central Access Point; AD9430DN-24 Central Access Point and</li> </ul> </li> </ul>



Patent No.	Claims	Accused Products
		<p>AD9430DN-12 Central Access Point),</p> <ul style="list-style-type: none"> <li>• AP1000 series (including AP1050DN-S Access Point),</li> <li>• AP2000 series (including AP2051DN &amp; AP2051DN-E; AP2051DN-S; DN2050DN and AP2050DN-E Access Points and AP2030DN and AP2010DN Wall Plate Access Points)</li> <li>• AP3000 series,</li> <li>• AP4000 series (including AP4050DE-M; AP4050D-E; AP4050DN-HD; AP4050DN; AP4030TN; AP4030DN &amp; AP4130DN; AP4051TN; AP4051DN &amp; AP4151DN)</li> <li>• AP5000 series (including AP5510-W-GP; AP5030DN &amp; AP5130DN),</li> <li>• AP6000 series (including AP6052DN, AP6050DN &amp; AP6150DN, AP6510DN-AGN and AP6610DN-AGN 802.11n Outdoor Access Points),</li> <li>• AP7000 series (including AP7060DN, AP7052DE, AP7050DE, AP7052DN &amp; AP7152DN),</li> <li>• AP8000 series (including AP8082DN &amp; AP8182DN; 8030DN and 8130DN; AP8050TN-HD; AP8050DN &amp; AP8150DN),</li> <li>• AP9000 series Access</li> </ul>

Patent No.	Claims	Accused Products
		<p>Points,</p> <ul style="list-style-type: none"> <li>• the AT815SN Outdoor Access Terminal</li> <li>• and other models that include WIDS or similar functionality.</li> <li>• Huawei remote units including <ul style="list-style-type: none"> <li>• R230D,</li> <li>• R240D,</li> <li>• R250D,</li> <li>• R250D-E,</li> <li>• R251D,</li> <li>• R251D-E, and</li> <li>• R450D Remote Units and other models that include WIDS or similar functionality</li> </ul> </li> <li>• Huawei Access Controllers (ACs) including <ul style="list-style-type: none"> <li>• AC6805,</li> <li>• AC6508,</li> <li>• AC6800V,</li> <li>• AC6605,</li> <li>• AC6005,</li> <li>• AC6003,</li> <li>• ACU2 Wireless Access Controller Unit,</li> <li>• X1E Series Native Wireless Access Controller Card,</li> <li>• and other models that include WIDS or similar functionality.</li> </ul> </li> <li>• Huawei Routers, which may act as Access Controllers, including, on information and belief: AR Series (including AR120, AR150, AR160, AR200, AR500, AR510, AR1200, AR2200, AR3200, AR3600 Series Enterprise Routers.</li> </ul>

Patent No.	Claims	Accused Products
		<ul style="list-style-type: none"> <li>eSight Platform, eSight WLAN Manager and other eSight products that support WIDS</li> </ul>
7,327,690	32-34, 36, 38-43, 71-73, 75-80	<p>Huawei <u>wireless local and metro area networks (Wireless LAN/MANs)</u> and products that support Wireless Intrusion Detection System (WIDS) and/or other similar intrusion detection technology, including:</p> <ul style="list-style-type: none"> <li>Wireless LANs/MANs</li> <li>Wireless LAN/MAN products</li> <li>Huawei Laptops, tablets and consumer devices that support Wi-Fi (802.11), <u>and/or interact with or implement aspects of WIDS or similar intrusion detection technology (such as the Wi-Fi threat detection features of EMUI)</u>, when connected to a Huawei Wireless LAN/MAN, including: <ul style="list-style-type: none"> <li>MateBook 13</li> <li>MateBook X Pro</li> <li>MateBook D 14" (AMD)</li> <li>MediaPad M5 lite</li> <li>MediaPad T5</li> <li>MediaPad M5 8.4"</li> <li>MediaPad M5 10.8"</li> <li>MateBook X</li> <li>MateBook D</li> <li>MateBook D 14" (Intel)</li> <li>MediaPad M5 Pro</li> <li>MediaPad M3</li> <li>MediaPad M3 Lite</li> <li>MediaPad T3 10</li> <li>MediaPad T3 8</li> <li>MediaPad T3 7</li> <li>MateBook E</li> <li>MediaPad M2 10.0</li> </ul> </li> </ul>

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Patent No.	Claims	Accused Products
		<p>AD9430DN-12 Central Access Point),</p> <ul style="list-style-type: none"> <li>• AP1000 series (including AP1050DN-S Access Point),</li> <li>• AP2000 series (including AP2051DN &amp; AP2051DN-E; AP2051DN-S; DN2050DN and AP2050DN-E Access Points and AP2030DN and AP2010DN Wall Plate Access Points)</li> <li>• AP3000 series,</li> <li>• AP4000 series (including AP4050DE-M; AP4050D-E; AP4050DN-HD; AP4050DN; AP4030TN; AP4030DN &amp; AP4130DN; AP4051TN; AP4051DN &amp; AP4151DN)</li> <li>• AP5000 series (including AP5510-W-GP; AP5030DN &amp; AP5130DN),</li> <li>• AP6000 series (including AP6052DN, AP6050DN &amp; AP6150DN, AP6510DN-AGN and AP6610DN-AGN 802.11n Outdoor Access Points),</li> <li>• AP7000 series (including AP7060DN, AP7052DE, AP7050DE, AP7052DN &amp; AP7152DN),</li> <li>• AP8000 series (including AP8082DN &amp; AP8182DN; 8030DN and 8130DN; AP8050TN-HD; AP8050DN &amp; AP8150DN),</li> <li>• AP9000 series Access</li> </ul>

Patent No.	Claims	Accused Products
		<p>Points,</p> <ul style="list-style-type: none"> <li>• the AT815SN Outdoor Access Terminal</li> <li>• and other models that include WIDS or similar functionality.</li> <li>• Huawei remote units including <ul style="list-style-type: none"> <li>• R230D,</li> <li>• R240D,</li> <li>• R250D,</li> <li>• R250D-E,</li> <li>• R251D,</li> <li>• R251D-E, and</li> <li>• R450D Remote Units and other models that include WIDS or similar functionality</li> </ul> </li> <li>• Huawei Access Controllers (ACs) including <ul style="list-style-type: none"> <li>• AC6805,</li> <li>• AC6508,</li> <li>• AC6800V,</li> <li>• AC6605,</li> <li>• AC6005,</li> <li>• AC6003,</li> <li>• ACU2 Wireless Access Controller Unit,</li> <li>• X1E Series Native Wireless Access Controller Card,</li> <li>• and other models that include WIDS or similar functionality.</li> </ul> </li> <li>• Huawei Routers, which may act as Access Controllers, including, on information and belief: AR Series (including AR120, AR150, AR160, AR200, AR500, AR510, AR1200, AR2200, AR3200, AR3600 Series Enterprise Routers.</li> </ul>

Patent No.	Claims	Accused Products
		<ul style="list-style-type: none"> <li>eSight Platform, eSight WLAN Manager and other eSight products that support WIDS</li> </ul>
7,440,572	1, 47	The Huawei Zigbee Products, as listed <del>below</del> <u>above</u> with respect to the '537 patent.

### III. CLAIM CHARTS FOR INFRINGEMENT OF THE ASSERTED PATENTS (P.R. 3-1 (c))

Attached as Exhibits A-F are claim charts showing infringement of the Asserted Patents identifying where each limitation of each Asserted Claim is found in each Accused Instrumentality, including identification of the structures, acts, or materials in the Accused Instrumentalities that perform the function limitations governed by 35 U.S.C. § 112(6).

Exhibit	Chart For Patent No.
A.	6,535,227
B.	6,958,986
C.	6,980,537
D.	7,027,426
E.	7,224,678
F.	7,327,690
G.	7,440,572

### IV. INFRINGEMENT OF THE ASSERTED PATENTS UNDER THE DOCTRINE OF EQUIVALENTS (P.R. 3-1(d))

Based on its current investigation, Harris contends that each limitation of each Asserted Claim is literally present in one or more of the Accused Instrumentalities. For each Asserted Claim, based on Harris' current investigation, Harris has preliminarily identified certain limitations that are alternatively satisfied under the doctrine of equivalents. Harris expressly reserves the right to apply the doctrine of equivalents to additional Asserted Claim limitations

after discovery from Huawei, or as appropriate in response to the Court's legal determination of issues, including without limitation the construction of the Asserted Claims.

**V. PRIORITY TO EARLIER PATENT APPLICATIONS (P.R. 3-1 (e))**

All Asserted Claims of each Asserted Patent are entitled to priority dates at least as early as shown in the table below:

<b>Patent No.</b>	<b>Priority Date</b>
6,535,227	Feb. 8, 2000
6,958,986	Jan. 10, 2002
6,980,537	Nov. 12, 1999
7,027,426	Aug. 5, 2002
7,224,678	Aug. 12, 2002
7,327,690	Aug. 12, 2002
7,440,572	Jan. 16, 2002

**VI. RELIANCE ON PLAINTIFF'S OWN PRODUCTS AS PRACTICING THE CLAIMED INVENTIONS (P.R. 3-1 (F))**

Harris currently contends that the following products or methods practice the Asserted Claims of the Asserted Patents. Harris continues to investigate and reserves the right to amend this disclosure if it discovers additional products that practice the claimed inventions.

All claims of the 7,440,572 Patent are practiced by the Harris SecNet 11 and SecNet 11 Plus products. Further, all claims of the 6,535,227 Patent are practiced by the Harris Network Vulnerability Tool (NVT), STAT Analyzer and SiS Analyzer.

**VII. DOCUMENTS SUFFICIENT TO EVIDENCE DISCUSSION WITH, DISCLOSURE TO, OR OTHER MANNER OF PROVIDING TO A THIRD PARTY OR SALE OF OR OFFER TO SELL, THE CLAIMED INVENTION PRIOR TO THE APPLICATION DATE OF THE ASSERTED PATENTS (P.R. 3-2(a))**

Documents currently in the possession, custody, or control of Harris sufficient to evidence discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, the claimed invention prior to the application date of the Asserted Patents were



served on April 3, 2019, contemporaneously with Harris' initial Disclosure of Asserted Claims and Infringement Contentions. *See, e.g.*, HARRIS-H003520-HARRIS-H003583, HARRIS-H003302-HARRIS-H003360, HARRIS-H016758-HARRIS-H016775, HARRIS-H003476-HARRIS-H003481, HARRIS-H016822-HARRIS-H016832, HARRIS-H016634, HARRIS-H003008-HARRIS-H003027, HARRIS-H003482-HARRIS-H003519, HARRIS-H016753-HARRIS-H016754, HARRIS-H016755-HARRIS-H016757, HARRIS-H016777-HARRIS-H016783, HARRIS-H016784, HARRIS-H002951-HARRIS-H002962, HARRIS-H016813-HARRIS-H016821, HARRIS-H016793-HARRIS-H016801, HARRIS-H016802-HARRIS-H016812, HARRIS-H016651-HARRIS-H016653, HARRIS-H016674-HARRIS-H016747, HARRIS-H016748, HARRIS-H016749, HARRIS-H016750, HARRIS-H016751, HARRIS-H016752, HARRIS-H002963-HARRIS-H002985, HARRIS-H016611-HARRIS-H016619, HARRIS-H002986-HARRIS-H003007, HARRIS-H003119-HARRIS-H003209, HARRIS-H016654-HARRIS-H016664, HARRIS-H016665, HARRIS-H016666, HARRIS-H016667, HARRIS-H016668, HARRIS-H016669, HARRIS-H016670. Identification of such documents under this subsection is not an admission that any such disclosure or discussion constituted the entire claimed inventions. Harris reserves the right to supplement its production should additional documents of these types be located or come into its possession.

**VIII. DOCUMENTS EVIDENCING THE CONCEPTION, REDUCTION TO PRACTICE, DESIGN, AND DEVELOPMENT OF THE CLAIMED INVENTION (P.R. 3-2(b))**

Documents currently in the possession, custody, or control of Harris evidencing conception and reduction to practice, and design and development of each claimed invention, were served on April 3, 2019, contemporaneously with Harris' initial Disclosure of Asserted Claims and Infringement Contentions. *See, e.g.*, HARRIS-H016822-HARRIS-H016832, HARRIS-H016634, HARRIS-H016789, HARRIS-H003028-HARRIS-H003118, HARRIS-

H003302-HARRIS-H003360, HARRIS-H016758-HARRIS-H016775, HARRIS-H016788, HARRIS-H016792, HARRIS-H003461-HARRIS-H003475, HARRIS-H016585, HARRIS-H018711, HARRIS-H016672-HARRIS-H016673, HARRIS-H003476-HARRIS-H003481, HARRIS-H016651-HARRIS-H016653, HARRIS-H016674-HARRIS-H016747, HARRIS-H016748, HARRIS-H016749, HARRIS-H016750, HARRIS-H016751, HARRIS-H016752, HARRIS-H003375-HARRIS-H003392, HARRIS-H016753-HARRIS-H016754, HARRIS-H016755-HARRIS-H016757, HARRIS-H016777-HARRIS-H016783, HARRIS-H016784, HARRIS-H002951-HARRIS-H002962, HARRIS-H003405-HARRIS-H003460, HARRIS-H016787, HARRIS-H016620-HARRIS-H016628, HARRIS-H016629, HARRIS-H016630, HARRIS-H016631, HARRIS-H016632, HARRIS-H016633, HARRIS-H003520-HARRIS-H003583, HARRIS-H002963-HARRIS-H002985, HARRIS-H016611-HARRIS-H016619, HARRIS-H016791, HARRIS-H002986-HARRIS-H003007, HARRIS-H003119-HARRIS-H003209, HARRIS-H003393-HARRIS-H003404, HARRIS-H016776, HARRIS-H016654-HARRIS-H016664, HARRIS-H016665, HARRIS-H016666, HARRIS-H016667, HARRIS-H016668, HARRIS-H016669, HARRIS-H016670, HARRIS-H016813-HARRIS-H016821, HARRIS-H016586, HARRIS-H003361-HARRIS-H003374, HARRIS-H016671, HARRIS-H016785, HARRIS-H016786, HARRIS-H016793-HARRIS-H016801, HARRIS-H016802-HARRIS-H016812, HARRIS-H003008-HARRIS-H003027, HARRIS-H003210-HARRIS-H003301, HARRIS-H016790, HARRIS-H016635-HARRIS-H016645, HARRIS-H016646, HARRIS-H016647, HARRIS-H016648, HARRIS-H016649, HARRIS-H016650, HARRIS-H003482-HARRIS-H003519. Harris reserves the right to supplement its production should additional documents of these types be located or come into its possession.

**IX. COPIES OF THE FILE HISTORIES FOR EACH PATENT IN SUIT (P.R. 3-2(c))**

Copies of the file histories for each Asserted Patent were served on April 3, 2019, contemporaneously with Harris' initial Disclosure of Asserted Claims and Infringement Contentions. *See* HARRIS-H001712-HARRIS-H002176;HARRIS-H018712-HARRIS-H019176, HARRIS-H001433-HARRIS-H001689;HARRIS-H018427-HARRIS-H018683, HARRIS-H000857-HARRIS-H001112;HARRIS-H017843-HARRIS-H018098, HARRIS-H000510-HARRIS-H000826;HARRIS-H017492-HARRIS-H017808, HARRIS-H001127-HARRIS-H001409;HARRIS-H018117-HARRIS-H018399, HARRIS-H000219-HARRIS-H000461;HARRIS-H017055-HARRIS-H017297, HARRIS-H000001-HARRIS-H000194;HARRIS-H016833-HARRIS-H017026.

Dated: July 29, 2019~~May 22, 2019~~

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served electronically on all counsel who are deemed to have consented to electronic service.

Dated: ~~May 22, 2019~~ July 29, 2019

By: /s/ Denise De Mory  
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